The Law Offices of
Carlos G. Garcia, LLC
Attorneys & Counselors-At-Law

AREAS OF PRACTICE
- Bankruptcy
- Business Law
- Corporations
- Criminal Defense
- Civil Litigation
- Divorce
- Family Law
- Immigration
- Real Estate
- Translations
- Wills
- Traffic Matters

66 Second Avenue
Brentwood, NY 11717
Tel. No.: 631.436.5589
Fax No.: 631.436.5643
E-mail at:
carlosgarcialaw@gmail.com

Via ECF

February 13, 2015

The Hon. Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Subject : **Letter Motion to Remove, Delete and Replace from the Docket Exhibits 5 & 6 of Defendants' Memorandum of Law in Opposition (Document No. 38 filed on 02/06/2015) Re: Macolor v. Libiran, et. al. 14 Civ. 4555 (JMF)(SDNY)**

Dear Judge Furman:

We have been very recently notified this February 11, 2015 that sensitive and/or confidential information may have been inadvertently disclosed in ***Exhibits 5*** and *6* of Defendants' *Memorandum of Law in Opposition* to Plaintiff's motion which documents were filed this February 6, 2015 via ECF. In the immediate effort to rectify this error, we attempted to contact SDNY yesterday but we realized that the courts were close this February 12, 2015. Hence, this letter motion.

We have revisited the documents filed consisting of about 228 pages, and we believe there may have been documents that may contain information subject to redaction rules as the incorrect files were uploaded. We have accordingly resolved to correct this error. In this regard, it is most respectfully requested that the Court issue an order deleting and removing the previously filed *Exhibits 5* and *6* of Defendants' Memorandum of Law in Opposition in this Court's Docket under *Document No. 38* and for the Court to admit the redacted version of *Exhibits 5* and *6* annexed herein in lieu of the deleted Exhibits. The Exhibits are identical in all respects other than for the redacted items.

Finally, we have already informed and requested ECF Help Desk to block public access to the documents subject of this Letter Motion.

Respectfully yours,

Carlos G. Garcia